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(A Limited Liability Corporation including Professional Corporations)

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May 22, 2014

Hon. Michael B. Kaplan, USBJ
402 East State Street
Trenton, New Jersey 08608

RE: Bayfront Marina & Yacht Basin, LLC
BK Case # 14-20165

Dear Judge Kaplan:

The Debtor respectfully submits this in opposition to the Short Notice Application for Stay Relief by Litho-Tech, Inc.

Although we understand the frustration of creditor in this matter, and have been made aware of the issues that led to the dismissal of the Chapter 11 proceeding, this bankruptcy filing is quite different and is substantive. The debtor is liquidating the assets for the benefit of all creditors.

It has been the belief the principal of the debtor corporation that if proper investment and effort were made to the property, it could be successfully marketed to permit the satisfaction of all claims against the Debtor Corporation. Over the past few months, there have been suggestions of interest in the property from various parties which could permit such a sale. We strongly believe the Chapter 7 Trustee should be permitted that opportunity.

This emergency filing was necessitated by the surprising ability of Litho-Tech and Mr. Woortman to have the property re-listed for Sheriff's Sale almost within a day of the Court's dismissal of the Chapter 11. I would note that in Mr. Woortman's haste to return to the Court to now obtain stay relief, he certifies that there is no equity in the property based on "a review of the Debtor's Petition and Schedules.." Debtor has not filed any schedules yet so it is unclear how this can be. The prior Chapter 11 did indicate that under the correct circumstances, the property had the potential to yield a sales price in excess of \$ 1.2M, and this has been apparently confirmed now by the Chapter 7 Trustee.



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There is no emergency which requires shortened notice of this application and we would ask that it be scheduled in the normal fashion for proper opposition and argument. Thank you.

Respectfully yours,

/s/ Steven J. Abelson

ABELSON & TRUESDALE, LLC
By: Steven J. Abelson, Esq.

SJA/aoc
cc: Kevin Quinlan, Esq.
John Michael McDonnell, Trustee
Mr. Keith Boyce